

Neal, Arthur

From: EdwardSons@aol.com%inter2 [EdwardSons@aol.com] on behalf of EdwardSons@aol.com
Sent: Friday, August 05, 2005 8:00 PM
To: National List
Cc: EdwardSons@aol.com%inter2
Subject: Comments - Docket Number TM-0407
Attachments: ATTACHMENT.TXT

To Arthur Miller
 Director
 Program Administration
 National Organic Program

From Joel Dee
 President
 Edward & Sons Trading Company, Inc.

Dear Sir:

It is my personal opinion, and the opinion of our company mangement, that all of the ingredients and processing aids currently approved on the National List should remain approved for use in organic products beyond their scheduled expiration date of October 21, 2007. We believe the process of evaluating and adding items to the National List is sound, and protective of consumers while maintaining the integrity of finished organic products. We understand that our comments must specify individual items. We herewith petition for the following items to remain as "approved" on the National List for use in the production and processing of organic products:

**pectin,
 agar agar,
 dairy cultures,
 citric acid,
 ascorbic acid,
 natural flavors,
 natural colors,
 carageenan,
 guar gum,
 xanthan,
 lecithin,
 naturally grown yeast and yeast extracts,
 alginates,
 enzymes,
 tocopherols,
 calcium stearate,
 magnesium stearate,
 glucono delata lactone,**

We have specific working experience with these materials, and wholeheartedly support their continued use as minor support ingredients or processing aids used in the production of organic products. We consider them to be important ingredients in many value-added organic food products, including but not limited to confections, baked goods, canned or preserved fruits and vegetables, and numerous specialty snacks. Without their use, entire categories of value-added organic products will disappear from store shelves. This would significantly reduce demand for the primary organic agricultural components now employed as the base for these value-added consumer products. If the sunset provision is allowed to remove these items from the National List, we believe the effect will be devastating to consumers, who will suddenly find that they can no longer purchase scores of organic packaged products they had been enjoying for years. Both consumers and the organic industry will greatly benefit from the continued approval of the above items on the National List.

8/8/2005

Respectfully,

Joel Dee
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